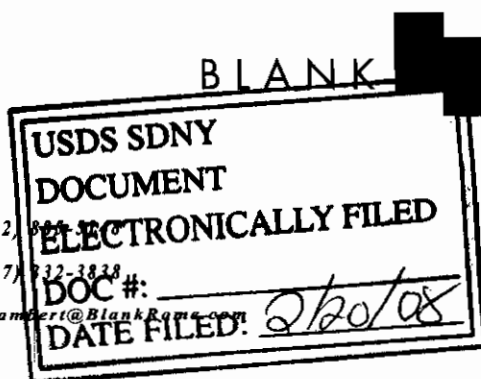


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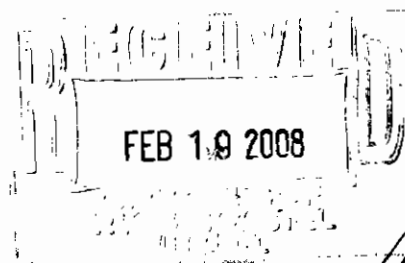


ROME LLP
 COUNSELORS AT LAW

February 15, 2008

BY HAND

Honorable P. Kevin Castel
 United States District Judge
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street, Room 2260
 New York, New York 10007-1312



SO ORDERED.

[Handwritten signature]
 JSJ

MEMO ENDORSED

Clipper Steel Services, B.V., v. Gremio Unido De Alijadores S. de R.L.
 Docket No: (S.D.N.Y.) 07-10963 (PKC)
 Our Ref. No. 695117-00603

5-19-08

Dear Judge Castel:

We represent plaintiff Clipper Steel Services, B.V. This is a by now familiar "Rule B" maritime attachment action. The merits of the dispute will be decided by litigation in Mexico. Plaintiff seeks to recover \$299,235.28, including costs and attorneys fees from Defendant, a stevedoring company in Tampico, Mexico.

We provide this further status report in light of our letter of January 16, 2008.

At present, the parties, including Garnishee Citibank, are to appear for a pretrial/promotion conference on February 26, 2008. We respectfully request that the conference be adjourned to March 20, 24, or 25 in the morning as to the Court is convenient.

No one has appeared for Defendant. Other than the \$5,000 which was attached on December 14, 2007, no further funds have been attached either in this action or a similar action filed in the Southern District of Texas.

As described in our letter of January 16, 2008, a dispute has arisen between Plaintiff and Citibank regarding Citibank's release of \$294,235.28 which Plaintiff contends Citibank should restrained.

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February 15, 2008
Page 2

The Court adjourned the conference then scheduled for January 25 to February 25. Citibank has appointed outside counsel. At the request of counsel for Citibank, that date was adjourned to February 26.

Citibank has provided documents in response to a subpoena we served. We and counsel for Citibank are clarifying compliance issues and attempting to identify an appropriate witness with knowledge. At present, it appears that the most appropriate witness may not be in the immediate New York City area and may be in Buffalo or Delaware. Counsel are working professionally with each other on these issues, but it has not been and will not be possible to take the deposition(s) prior to February 26 due to counsel's schedules.

Accordingly, we respectfully request that the conference be adjourned to March 20, 24, or 25 in the morning, to enable Plaintiff and Citibank to complete discovery in connection with the circumstances of the release of the \$294,235.28 described above.

Counsel for Citibank joins in the request for an adjournment.

We are of course at the Court's disposal to answer any questions. Otherwise, we thank the Court in advance for its consideration of and favorable action upon this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "LeRoy Lambert".

LeRoy Lambert

LRL/mg

cc: By Email Image
Barry Glickman
Zeichner Ellman & Krause LLP
575 Lexington Ave., 10th Floor
New York, NY 10022